

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Southern District of TexasUnited States Courts  
Southern District of Texas  
FILED**April 22, 2024**

Nathan Ochsner, Clerk of Court

United States of America  
v.  
Arnulfo Hinojosa, Jr. (1981/US)

Case No. M-24-0659-M

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 22, 2024 in the county of Starr in the  
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

21 USC § 952

Illegal Importation of a Controlled Substance / Approximately 142 Kilograms  
of Methamphetamine, a Schedule II Controlled Substance.

21 USC § 963

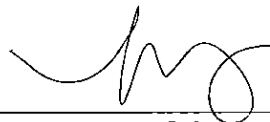
Conspiracy to Illegally Import a Controlled Substance / Approximately 142  
Kilograms of Methamphetamine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Complaint authorized by: AUSA Theodore Parran

Submitted by reliable electronic means, sworn to  
and attested to telephonically per Fed. R. Cr. 4.1,  
and probable cause found on:Date: April 22, 2024 at 8:59pmCity and state: McAllen, Texas/s/ Nicholas C. Stott*Complainant's signature*Nicholas C. Stott, HSI Special Agent*Printed name and title**Judge's signature*U.S. Magistrate Judge Nadia S. Medrano*Printed name and title*

**Attachment "A"**

I, Nicholas C. Stott, am a Special Agent of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause. I do not rely upon facts not set forth herein in reaching my conclusion that a complaint should be issued, nor do I request that this Court rely upon any facts not set forth herein in reviewing this attachment in support of the complaint.

1. On April 22, 2024, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection Office of Field Operations at the Rio Grande City Port of Entry (POE) in Rio Grande City, Texas. CBP Officers (CBPOs) detained Arnulfo Hinojosa, Jr. ("HINOJOSA"), a United States citizen, while attempting to enter the U.S. with approximately 142 kilograms of methamphetamine concealed within aftermarket constructed concealed compartments and the fuel tank of the vehicle HINOJOSA was driving.
2. During primary inbound inspection, CBPOs obtained a negative oral declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00 from HINOJOSA. CBPOs referred HINOJOSA and the vehicle to secondary inspection for further inspection.
3. A CBP K-9 drug detection team conducted a free air inspection which resulted in a positive alert for the odor of controlled substance(s) emanating from the vehicle.
4. A physical search of the vehicle was conducted, and approximately 101 vacuum sealed packages, weighing approximately 142 kilograms, were discovered concealed within aftermarket constructed concealed compartments and the fuel tank of the vehicle. CBPOs field tested the crystalline substance which was presumptive positive for the properties and characteristics of methamphetamine.
5. A HSI Special Agent (SA) responded to the Rio Grande City POE to assist in the investigation. The HSI SA interviewed HINOJOSA, who stated was working for a drug trafficking organization and knew he was transporting drugs into the United States from Mexico.